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7 Attorneys for Specially Appearing
Defendants RCI HOSPITALITY
8 HOLDINGS, INC. and CASEY GROVER

9 **UNITED STATES DISTRICT COURT**

10 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

11
12 JULIA HUBBARD and KAYLA
GOEDINGHAUS,

13 Plaintiffs,

14 vs.

15 TRAMMELL S. CROW, JR.,
16 DR. BENJAMIN TODD ELLER,
RICHARD HUBBARD,
17 DR. MELISSA MILLER, DR. JOSEPH
BOLIN, DR. SCOTT WOODS,
18 DR. MRUGESHKUMAR SHAH,
MICHAEL CAIN, COE JURACEK,
19 PHILIP ECOB, H.J. COLE, TEXAS
RANGER CODY MITCHELL, KURT
20 KNEWITZ, PAUL PENDERGRASS,
RALPH ROGERS, ROBERT PRUITT,
21 SCOTT BRUNSON, CASE GROVER,
RICHARD BUTLER, MARK
22 MOLINA, MICHAEL HYNES, JR.,
SHAWN MAYER, JADE MAYER,
23 RCI HOSPITALITY HOLDINGS,
INC., INTEGRITY BASED
24 MARKETING, LLC, STORM
FITNESS NUTRITION, LLC, ULTRA
25 COMBAT NUTRITION, LLC,
ECOLOFT HOMES LLC, ELÉVATED
26 WELLNESS PARTNERS LLC, DOE
INDIVIDUALS 1–20, and DOE
27 COMPANIES 21–30,

28 Defendants.

CASE NO. 2:22-cv-7957

**STIPULATION TO EXTEND TIME
FOR DEFENDANT CASEY
GROVER TO RESPOND TO
INITIAL COMPLAINT BY NOT
MORE THAN 30 DAYS [L.R. 8-3.]**

**Complaint Served: January 3, 2023
Current Response Date: January 23,
2023
New Response Date: February 23,
2023**

Action Filed: November 1, 2022

CASE NO. 2:22-cv-7957

STIPULATION TO EXTEND TIME FOR DEFENDANT CASEY GROVER TO RESPOND TO INITIAL
COMPLAINT BY NOT MORE THAN 30 DAYS [L.R. 8-3]

1 TO THE COURT, ALL PARTIES AND TO THEIR ATTORNEYS OF
2 RECORD:

3 Pursuant to Local Rules 7-1 and 8-3, Plaintiffs Julia Hubbard and Kayla
4 Goedinghaus (“Plaintiffs”), by and through their counsel, and Defendant Casey
5 Grover (“Grover”), hereby stipulate as follows:

6 RECITALS

7 WHEREAS, on November 1, 2022, Plaintiffs filed their Initial Complaint in
8 the above-entitled action. (ECF No. 1.)

9 WHEREAS, on January 3, 2023, Plaintiffs served Grover with the Complaint.

10 WHEREAS, Grover’s answer to the Complaint was due January 23, 2023.

11 WHEREAS, Grover has been attempting to retain local counsel in California
12 to represent them in the above-entitled action, and only recently obtained such
13 counsel.

14 WHEREAS, Grover and his California counsel require additional time to
15 answer or otherwise respond to the Complaint, as well as comply with Local Rule 7-
16 3.

17 STIPULATION

18 IT IS HEREBY STIPULATED, by and between Plaintiffs and Grover as
19 follows:

20 Grover shall have up to and including February 23, 2023 to answer or
21 otherwise respond to the Complaint. This stipulation shall constitute a special
22 appearance by Grover and shall not waive any defenses under Federal Rule of Civil
23 Procedure 12(b), or relating to personal jurisdiction, forum or venue, consistent with
24 Section 418.10(d) of the California Code of Civil Procedure.

25
26 [SIGNATURES FOLLOW ON NEXT PAGE]

27 ///

28 ///

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1 DATED: February 14, 2023

BALESTRIERE FARIELLO
KABATECK LLP

2
3 By: /s/ Matthew W. Schmidt
4 John G. Balestriere
5 Matthew W. Schmidt
6 Anastasia K. Mazzella
7 Attorneys for Plaintiffs

8 DATED: February 14, 2023

YUKEVICH | CAVANAUGH

9
10 By: /s/ Justin M. Marvisi
11 Delmar S. Thomas
12 Justin M. Marvisi
13 Olivia H. Kim
14 Attorneys for Specially Appearing
15 Defendants RCI HOSPITALITY
16 HOLDINGS, INC. and CASEY GROVER

17 **ATTESTATION PURSUANT TO LOCAL RULE 5-4.3.4(a)(2)(i)**

18 Pursuant to Local Rule of Civil Procedure 5-4.3.4(a)(2)(i), the filer of this
19 document attests that all the other signatories listed, and on whose behalf the filing
20 is submitted, concur in the filing's content and have authorized the filing.

21 DATED: February 14, 2023

YUKEVICH | CAVANAUGH

22 By: /s/ Justin M. Marvisi
23 Delmar S. Thomas
24 Justin M. Marvisi
25 Olivia H. Kim
26 Attorneys for Specially Appearing
27 Defendants RCI HOSPITALITY
28 HOLDINGS, INC. and CASEY GROVER

PROOF OF SERVICE**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 355 South Grand Avenue, Fifteenth Floor, Los Angeles, CA 90071-1560.

On February 14, 2023, I served true copies of the following document(s) described as **STIPULATION TO EXTEND TIME FOR DEFENDANT CASEY GROVER TO RESPOND TO INITIAL COMPLAINT BY NOT MORE THAN 30 DAYS [L.R. 8-3.]** on the interested parties in this action as follows:

SEE CM/ECF SERVICE LIST

BY CM/ECF NOTICE OF ELECTRONIC FILING: I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on February 14, 2023, at Los Angeles, California.

/s/ Deanna Castellanos

Deanna Castellanos

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